

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**NORTHWEST AIRLINES CORPORATION, et al.,  
Debtors.**

**Chapter 11**

**Case No. 05-17930 (ALG)**

**Jointly Administered**

**BRUCE W. CRESS, PETER OCHABAUER, WALTER  
BOULDEN, MARK A. KNUDSEN, CHRISTOPHER J.  
PARKYN, AMANDA R. OCHABAUER, AND BERNARD  
C. LARKIN,**

**Appellants,**

**-against-**

**NORTHWEST AIRLINES CORPORATION, et al.,  
Appellees.**

**Case No. 07-cv-05658 (JGK)**

**DECLARATION OF NATHAN A. HAYNES IN SUPPORT OF  
MEMORANDUM OF LAW IN SUPPORT OF MOTION TO DISMISS APPEAL OF  
BRUCE W. CRESS ET AL. FOR FAILURE TO TIMELY FILE BRIEF**

Nathan A. Haynes, an attorney duly admitted to practice before this Court, hereby declares under penalty of perjury that the following is true and correct to the best of his knowledge, information and belief.

1. I am admitted to practice before this Court and a special counsel at the firm of Cadwalader, Wickersham & Taft LLP (“CWT”), counsel to Northwest Airlines Corporation and certain of its direct and indirect subsidiaries, that were debtors and debtors in possession in the above-captioned chapter 11 cases.

2. I submit this declaration for the purpose of presenting to the Court certain documents in connection with Appellees' Memorandum of Law in Support of Motion to Dismiss Appeal of Bruce W. Cress, et al. For Failure to Timely File Brief.

3. The electronic docket for this case states that Appellants' brief was due on July 2, 2007. To date, Appellants have failed to file their brief and no extension of time within which to do so has been obtained.

4. Attached as Exhibit A is a copy of an Affidavit of Mailing of Appellees' Designation of Additional Items to be Included in Record of Appeal, dated June 15, 2007.

5. Attached as Exhibit B is a copy of the Notice of Electronic Filing, dated June 19, 2007, that was transmitted to counsel for Appellants indicating that a letter was sent notifying the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court") of the filing of the appeal and the assignment of case number 07-CV-5658 to the appeal.

6. Attached as Exhibit C is a copy of the Notice of Electronic Filing, dated June 19, 2007 that was transmitted to counsel for Appellants indicating that the appeal had been docketed.

7. Attached as Exhibit D is a copy of the Debtors' First Amended Joint and Consolidated Plan of Reorganization Under Chapter 11 of the Bankruptcy Code, which was confirmed by the Bankruptcy Court on May 18, 2007.

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Dated: New York, New York  
March 21, 2008

/s/ Nathan A. Haynes

NATHAN A. HAYNES